

**From:** p.smith134@verizon.net [mailto:p.smith134@verizon.net]

**Sent:** Monday, April 17, 2006 1:13 AM

**To:** Benham, Katherine

**Subject:** suggestion for access to pasture question

Dear Ms. Benham,

I just learned about the National Organic Standards Board and its meeting this week. I understand that I am too late to submit comments according to your deadline, but wish nevertheless to support "access to pasture" as being part of organic certification for dairy products. I order food for a school that serves 80 – 150 meals daily and we have recently switched to organic vendors and purchase organic products. However, I'm commenting on behalf of myself.

I was surprised to learn that the requirements for a certification of organic milk did not include that the cows must be allowed free access to grazing. The stress of limited movement and/or crowded conditions for cows affects their system's functioning, as described in the study "Behavioral and Pituitary Adrenal-Axis Responses of Dairy Cows to Social Isolation and Deprivation of Lying Down" by Lene Munksgaard and Henrik B. Simonsen, J. Anim. Sci. 1996. 74:769–778. I believe the stress affects their milk as well. More studies need to be done in this area. I purchase milk that is organic and also can claim that their cows are grass-fed and have access to pasture.

I wonder if there could be an additional level of organic certification for milk from cows that have access to grazing, rather than it being all or nothing (required or not required). That would satisfy the larger dairies as well as the consumers who may have higher standards and want to know the conditions under which the cows live. Thank you for considering these ideas.

Sincerely,  
Patricia Smith